

PART B REVIEW CHECKLIST

SECTION G - CONTINGENCY PLAN GENERAL INFORMATION

Last updated: May 2005

Facility/ID #		Date	
Reviewer		DO	

Relevant Guidance Documents: Guidance Concerning Contingency Plan Implementation and Incident Reporting - December, 1998

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
G <u>OAC 3745-54-51, 3745-54-52(B) or 3745-65-51, 3745-65-52(B)</u>						
Did the permittee provide a copy of the Contingency Plan (or Spill Prevention Control and Countermeasures (SPCC) Plan amended for hazardous waste management)?						
Are all documents cited in the contingency plan located in the body of the contingency plan or in an attachment section to the contingency plan?						
Is the description of the facility, personnel, equipment and associated structures up to date with the current facility status?						
Is the plan written in present tense including possible updates?						
Are all rule citations in the contingency plan correct and up to date?						
Does the contingency plan include material that would be considered a mod? (OAC 3745-54-54)						
G-1a <u>Floodplains</u> OAC 3745-54-18(B)						

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<p>If the facility is in a one-hundred-year floodplain, does the contingency plan state that the facility must be designed, constructed, operated, and maintained to prevent washout of any hazardous waste by a one-hundred-year flood unless the owner or operator can demonstrate that:</p> <p>[Note: "washout" means the movement of hazardous waste from the active portion of the facility as a result of flooding, "one-hundred-year floodplain" means any land area which is subject to a one percent or greater chance of flooding in any given year from any source.]</p>						
(1) procedures are in effect which will cause the waste to be removed safely, before flood waters can reach the facility, to a location where the wastes will not be vulnerable to floodwaters; or						
(2) for existing surface impoundments, waste piles, land treatment units, landfills, and miscellaneous units, no adverse effects on human health or the environment will result if washout occurs, considering:						
(a) the volume and physical and chemical characteristics of the waste in the facility;						
(b) the concentration of hazardous constituents that would potentially affect surface waters as a result of washout;						
(c) the impact of such concentrations on the current or potential uses of and water quality standards established for the affected surface waters; and						

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(d) the impact of hazardous constituents on the sediments of affected surface waters or the soils of the one-hundred-year floodplain that could result from washout. [Note: the location where wastes are moved must be a facility which is either permitted by the state of Ohio, or authorized to manage hazardous waste by a state with a hazardous waste management program authorized under 40 CFR Part 271.]						
G-1b <u>General Information:</u> OAC 3745-54-52						
In the contingency plan, does the facility provide:						
(1) the facility name?						
(2) the facility location?						
(3) the operator name?						
(4) a site plan?, and						
(5) a description of facility operations?						
Does the contingency plan describe the actions facility personnel must take to comply with rules 3745-54-51 (Purpose) and 3745-54-56 (Emergency Procedures) of the Administrative Code in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?						
G-2 <u>Emergency Coordinators:</u> OAC 3745-54-52(D), 3745-54-55						

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Does the contingency plan include names, addresses, office and home phone numbers of all persons qualified to act as emergency coordinator?						
Where more than one person is listed, is one person listed as the primary emergency coordinator, with others listed in the order in which they will assume responsibility as alternates?						
Does the contingency plan include the duties of primary and alternate coordinators?						
Does the contingency plan include a statement of authorization for the emergency coordinator to commit the resources necessary to implement the plan?						
Have employees, who are listed as able to act as the emergency coordinator in the event that the primary or secondary emergency coordinator cannot be reached, been authorized to commit the resources necessary to implement the contingency plan?						
Does the contingency plan state that an emergency coordinator will always be either on-site or on call?						
Does the plan state that the emergency coordinator must be required to be familiar with all aspects of the plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility and the facility layout?						
G-3 <u>Implementation:</u> OAC 3745-54-52 (A), 3745-54-51						

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Does the contingency plan describe <u>when</u> the contingency plan will be implemented (immediately, whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?) Does the plan provide information about the scenarios under which the contingency plan will be implemented (e.g. quantities or waste streams involved)? For example does the plan define a large spill or fire that would require implementation of the contingency plan?						
Does it describe <u>how</u> the contingency plan will be implemented?						
G-4 <u>Emergency Response Procedures</u>						
G-4a <u>Notification</u> : OAC 3745-54-56 (A) & (D)						
Does the contingency plan describe the methodology for immediate notification of facility personnel?						
Does the contingency plan describe the methodology for immediate notification of necessary state or local agencies with designated response roles?						
Does the plan describe the information that will be provided to the Ohio EPA and local authorities when a notification is made?						
Will the notification be made immediately upon determining the emergency situation has or may cause harm or hazard to human health and the environment (on- or off-site)?						

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In the event evacuation is necessary, does the plan indicate that the emergency coordinator will immediately contact local authorities, and be available to help those officials decide whether evacuation is necessary?						
Is the person or persons responsible for each notification identified?						
If the facility uses a specific emergency notification report form, is a copy or example of that report form provided in the contingency plan?						
Does the plan require the facility to notify the director and appropriate local authorities that the facility is in compliance with OAC 3745-54-56 (H) before operations are resumed in the affected area(s) of the facility?						
Does the contingency plan identify the authorities to be notified in each of the above cases?						
G-4b <u>Identification of Hazardous Materials:</u> OAC 3745-54-56 (B)						
Does the contingency plan describe procedures for identification of hazardous materials involved in the emergency?						
Does the contingency plan indicate that if possible the facility operating record will be consulted to determine which wastes are stored/treated/disposed in the affected area(s)?						
Does the plan identify areas that pose the most threat and the potential dangers that exist in those areas?						

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Are facility staff involved in identifying the affected materials properly trained to perform this evaluation? <i>The permit reviewer should check the personnel training section to ensure consistency with this requirement.</i>						
G-4c <u>Assessment:</u> OAC 3745-54-56 (C) & (D)						
Does the contingency plan describe the criteria used to assess the possible hazards to human health and the environment as a result of a <u>fire</u> ?						
Does the contingency plan describe the criteria used to assess the possible hazards to human health and the environment as a result of a <u>release</u> ?						
Does the contingency plan describe the criteria used to assess the possible hazards to human health and the environment as a result of an <u>explosion</u> ?						
Does the plan require assessment of the effects of any toxic, irritating, or asphyxiating gases that may be generated or the effects of any hazardous surface water run-off from water or chemical agents that may be used to control fire and heat-induced explosions?						
Does the contingency plan describe the criteria used to assess the possible hazards to human health and the environment that would result in the need for evacuation and notification of authorities?						
G-4d <u>Control Procedures:</u> OAC 3745-54-52 (A)						
Does the contingency plan specify control procedures to be taken in the event of a <u>fire</u> ?						

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Does the contingency plan specify control procedures to be taken in the event of <u>an explosion</u> ?						
Does the contingency plan specify control procedures to be taken in the event of <u>a release</u> ?						
Do these control procedures include, if necessary, the setting up of protective zones (hot, warm, cold, decontamination, etc.)						
If necessary, does the contingency plan describe the closing of storm drains during a spill, fire or explosion event?						
G-4e Prevention of Recurrence or Spread of Fires, Explosions, or Releases: OAC 3745 54-56 (E) & (F)						
Does the contingency plan describe the necessary steps to be taken ensure that fires do not occur, reoccur or spread to other hazardous waste at the facility?						
Does the contingency plan describe the necessary steps to be taken to ensure that explosions do not occur, reoccur or spread to other hazardous waste at the facility?						
Does the contingency plan describe the necessary steps to be taken to ensure that releases do not occur, reoccur or spread to other hazardous waste at the facility?						
Does the contingency plan state that the measures taken to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers?						

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Does the contingency plan state that if the facility stops operations in response to a fire, explosion, or release the emergency coordinator will monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment whenever this is appropriate?						
G-4f <u>Storage and Treatment of Released Material:</u> OAC 3745-54-56 (G)						
Does the contingency plan provide for treatment, storage, or disposal of any material that results from a release, fire, or explosion at the facility? Note: Unless the owner or operator can demonstrate, in accordance with paragraph (C) or (D) of OAC Rule 3745-51-03, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage such waste in accordance with all applicable requirements of Chapters 3745-52, 3745-53, 3745-54 to 3745-57, and 3745-218.						
G-4g <u>Incompatible Waste:</u> OAC 3745-54-56 (H)(1)						
Does the contingency plan describe provisions for prevention of incompatible waste from being treated, stored, or located in the affected areas until clean-up procedures are completed?						
G-4h <u>Post-Emergency Equipment Maintenance:</u> OAC 3745-54-56 (H)(2)						
Does the contingency plan describe procedures for ensuring that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed?						

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G-4i <u>Container Spills and Leakage:</u> OAC 3745-54-52, 3745-54-56 (G), 3745-55-71						
Does the contingency plan specify procedures to be used when responding to container spills or leakage, including procedures and timing for expeditious removal of spilled waste and repair or replacement of the container(s)?						
If the event involves container, does the contingency plan describe how that container will be removed, overpacked, or isolated?						
Does the contingency plan describe how the <u>area</u> in which the containers were located will be decontaminated after the event?						
G-4j <u>Tank Spills and Leakage</u>						
G-4j(1) <u>Stopping Waste Addition:</u> OAC 3745-55-94 (C), 3745-55-96 (A)						
For a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use, does the contingency plan document that the owner or operator will immediately stop the flow of hazardous waste into the tank system or secondary containment system?						
For a tank system or secondary containment from which there has been a leak or spill, or which is unfit for use, does the contingency plan document that the owner or operator will immediately inspect the system to determine the cause of the release?						
G-4j(2) <u>Removing Wastes:</u> OAC 3745-55-96 (B)						

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Does the contingency plan specify that if the release was from the tank system the owner/operator will, within 24 hours after detection of the leak, or if the owner/operator demonstrates that it is not possible, at the earliest practicable time, remove as much of the waste as necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed?						
In the event the material was released to a secondary containment system, does the contingency plan specify that all released materials will be removed within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment?						
Does the contingency plan specify after a release to the secondary containment from a tank, that decontamination of the area will occur in order to return the tank to service?						
G-4j(3) <u>Containment of Visible Releases:</u> OAC 3745-55-96 (C)						
Does the contingency plan specify that a visual inspection of the release will immediately be conducted?						
Does the contingency plan demonstrate that based on the visual inspection, further migration of the leak or spill to soils and surface water will be prevented?						
Does the contingency plan indicate that any visible contamination of the soil or surface water will be removed and properly disposed?						
Does the contingency plan indicate that confirmatory sampling will occur to determine that all contaminated media have been removed to clean levels?						

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G-4j(4) <u>Notifications, Reports:</u> OAC 3745-55-96 (D)(1) & (2); 3745-54-56 (I)						
Does the contingency plan state that any release from the tank system to the environment (except a leak or spill that is less than or equal to one pound and immediately contained and cleaned up) will be reported to the Director within 24 hours of its detection?						
Does the contingency plan describe how the director and the appropriate local authorities will be notified that the facility is in compliance with paragraph (H) of rule 3745-54-56 before operations are resumed in the affected areas of the facility?						
G-4j(5) <u>Provision of Secondary Containment, Repair, or Closure:</u> OAC 3745-55-96 (E) & (F)						
Does the contingency plan demonstrate, if the release has not damaged the integrity of the system, that the released waste will be removed and repairs, if necessary, will be made prior to returning the system to service?						
Does the contingency plan demonstrate, if the source of the release was a leak to the environment from a component of a tank system without secondary containment, secondary containment (satisfying OAC 3745-55-93) will be provided for the component from which the leak occurred, before the component can be returned to service, unless the component is an aboveground portion of a tank system that can be inspected visually?						

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If the source is an aboveground component that can be inspected visually, and the repair is a major repair (e.g., installation of an internal liner, repair of a ruptured primary containment or secondary containment vessel), does the contingency plan demonstrate that the system will not be returned to service without a certification by an independent, qualified, registered, professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?						
If a component is replaced to comply with the requirements of the above subparagraph, does the contingency plan demonstrate that the component will satisfy the requirements for new tank systems or components in OAC 3745-55-92 and 3745-55-93?						
Additionally if a leak has occurred in any portion of a tank system component that is not readily accessible for visual inspection (e.g., the bottom of an inground or onground tank) does the contingency plan demonstrate that the entire component will be provided with secondary containment in accordance with section OAC 3745-55-93 prior to being returned to use?						
G-4k <u>Surface Impoundment Spills and Leakage</u>						
G-4k(1) <u>Emergency Repairs:</u> OAC 3745-56-27 (A)						
Does the contingency plan describe the procedures to be used for removing a surface impoundment from service when the level of the liquid in the impoundment suddenly drops and the drop is not known to be caused by changes in the flow into or out of the impoundment or when the dike leaks?						

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G-4k(1)(a) <u>Stopping Waste Addition:</u> OAC 3745-56-27 (B)(1)						
Does the contingency plan state procedures for stopping waste additions to the impoundment?						
G-4k(1)(b) <u>Containing Leaks:</u> OAC 3745-56-27 (B)(2)						
Does the contingency plan state procedures for containing surface leakage that has occurred or is occurring?						
G-4k(1)(c) <u>Stopping Leaks:</u> OAC 3745-56-27 (B)(3)						
Does the contingency plan state procedures for stopping the leak?						
G-4k(1)(d) <u>Preventing Catastrophic Failure:</u> OAC 3745-56-27 (B)(4)						
Does the contingency plan state procedures for stopping or preventing catastrophic failure?						
G-4k(1)(e) <u>Emptying the Impoundment:</u> OAC 3745-56-27 (B)(5)						
Does the contingency plan procedures for emptying the impoundment, if necessary (e.g. if a leak cannot be stopped)?						
G-4k(1)(f) <u>Notification of the Director:</u> OAC 3745-56-27 (B)(6)						
Does the contingency plan state that the facility will submit written notification to the Director within seven days after the problem was detected?						

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G-4k(2) <u>Certification:</u> OAC 3745-56-27 (D)(1), 3745-56-26 (C)						
Does the contingency plan specify the procedure which will be followed for recertifying the dike's structural integrity, in the event the impoundment is removed from service as a result of actual or imminent dike failure?						
G-4k(3) <u>Emergency Repairs as a Result of Sudden Drop:</u> OAC 3745-56-27 (D)(2)						
Does the contingency plan specify the procedure, which will be followed in the event the impoundment is removed from service as the result of a sudden drop in the liquid level, for the installation of a liner (in compliance with 3745-56-21) for any existing portion of the impoundment?						
Does the contingency plan specify the procedure, which will be followed in the event the impoundment is removed from service as the result of a sudden drop in the liquid level, for the certification by a qualified engineer for other than existing portions of the impoundment?						
G-5 <u>Emergency Equipment:</u> OAC 3745-54-52 (E)						
Does the contingency plan include a list of all emergency equipment at the facility, including, but not limited to, fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment?						
Does the contingency plan describe the location, specifications, and capabilities of the emergency equipment?						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the contingency plan describe chemicals or other materials used to neutralize or absorb spills? If so are those chemicals and materials compatible with the hazardous waste?						
Does the plan include a statement that information will be updated?						
<i>The permit reviewer may need to review the preparedness and prevention section to ensure that changes in the contingency plan (or the original submittal) match the contingency plan submittal for the following:</i>						
(1) Does the preparedness and prevention section list all the emergency equipment listed in the contingency plan?, and						
(2) Does the preparedness and prevention plan include a schedule for inspection and maintenance of the emergency equipment listed in the contingency plan?						
G-6 Coordination Agreements: OAC 3745-54-52 (C), 3745-54-37						
When more than one police and fire department may respond to an emergency, does the contingency plan describe the agreements designating primary emergency authority to a specific police and specific fire emergency department and agreements with any others to provide support to the primary emergency authority?						
Does the contingency plan describe arrangements with Ohio EPA emergency response teams, emergency response contractors, and equipment suppliers?						

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	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the contingency plan state that arrangements have been made with local hospitals to familiarize them with the properties of hazardous waste handled at the facility and types of injuries or illnesses which could result from fires, explosions, or releases at the facility?						
Does the contingency plan state that the facility will document refusal to enter into a coordination agreement?						
G-7 <u>Evacuation Plan:</u> OAC 3745-54-52 (F)						
Does the contingency plan describe signal(s) to be used to begin evacuation?						
Does the contingency plan describe planned and alternate evacuation routes?						
G-8 <u>Required Reports:</u> OAC 3745-54-56 (J)						
Does the plan state that the time, date, and details of any incident that requires implementing the contingency plan must be noted in the operating record of the facility?						
Does the plan state that a report will be submitted to the director within 15 days after an incident that requires implementation of the contingency plan, and will contain the following information:						
(1) name, address, and telephone number of the owner or operator?						
(2) name, address, and telephone number of the facility?						
(3) date, time and type of incident?						

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(4) name and quantity of material(s) involved?						
(5) the extent of any injuries?						
(6) an assessment of actual or potential hazards to human health or the environment?						
(7) estimated quantity and disposition of recovered material that resulted from the incident?, and						
(8) other information as may be required by the director?						
<i>The permit reviewer should check to determine that the operating record will describe the maintenance of records identifying the time, date, and details of an emergency incident.</i>						
G-9 <u>Copies of the contingency plan</u> OAC 3745-54-53:						
Does the plan include provisions for maintaining a copy of the contingency plan at the facility and for distributing copies to all local police departments, fire departments, hospitals, Ohio EPA, and local emergency response teams?						
G-10 <u>Amendment of the contingency plan</u> OAC 3745-54-54						
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the facility's Ohio hazardous waste permit is revised?						
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the plan fails in an emergency?						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the facility changes in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or that changes the response necessary in an emergency?						
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when a change is required by the director?						
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the list of emergency equipment coordinators changes?						
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the list of emergency equipment changes?						